

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

SPRING PHARMACEUTICALS, LLC,

Plaintiff,

v.

RETROPHIN, INC., MARTIN SHKRELI,
MISSION PHARMACAL COMPANY, and
ALAMO PHARMA SERVICES, INC.,

Defendants.

Civil Action No. 2:18-cv-04553-JCJ

**DECLARATION OF DEEPTI BANSAL IN SUPPORT OF RETROPHIN, INC.'S
MOTION TO DISMISS PURSUANT TO 12(b)(1)**

I, Deepti Bansal, state the following pursuant to this Declaration:

1. I am an attorney at the law firm Cooley LLP, counsel for Defendant Retrophin, Inc. ("Retrophin"). I am duly licensed to practice law in the State of New York and District of Columbia. I submit this declaration in support of Defendant Retrophin's Motion to Dismiss, pursuant to 12(b)(1) of the Federal Rule of Civil Procedure.
2. A true and correct excerpted copy of Defendant Retrophin's Form 10-K for the fiscal year ended December 31, 2017, as filed with the United States Securities and Exchange Commission ("SEC"), is attached hereto as **Exhibit A**.
3. A true and correct excerpted copy of Defendant Retrophin's Form 10-Q for the quarterly reporting period ended September 30, 2018, as filed with the SEC, is attached hereto as **Exhibit B**.
4. A true and correct copy of Defendant Retrophin's Form 8-K, as filed with the SEC, is attached hereto as **Exhibit C**.

5. A true and correct copy of Jialue Charles Li's archived attorney profile from the website of Winston & Strawn LLP ("Winston & Strawn") as of October 22, 2016, archived from the Internet Archive - Wayback Machine, which can be searched for at <https://web.archive.org/>, and was accessed on January 14, 2019, is attached hereto as **Exhibit D**.
6. A true and correct excerpted copy of the ABA Section of Antitrust Law Spring Meeting 2016 Registration List, from the ABA's website, www.americanbar.org/content/dam/aba/events/antitrust_law/2016/04/attendees.xlsx, accessed on January 14, 2019, reflecting Mr. Li's registration as a Winston & Strawn attorney, is attached hereto as **Exhibit E**.
7. A true and correct excerpted copy of the ABA Section of Antitrust Law Spring Meeting 2017 Registration List, from the ABA's website, www.americanbar.org/content/dam/aba/events/antitrust_law/2017/03/attendees.xlsx, accessed on January 14, 2019, reflecting Mr. Li's registration as a Winston & Strawn attorney, is attached hereto as **Exhibit F**.
8. A true and correct excerpted copy of the ABA Section of Antitrust Law Antitrust in Health Conference 2018 Registration List, from the ABA's website, https://www.americanbar.org/content/dam/aba/administrative/antitrust_law/2018-athealthcare-attendees.xlsx, accessed on January 14, 2019, reflecting Mr. Li's registration as a Winston & Strawn attorney, is attached hereto as **Exhibit G**.
9. A true and correct copy of Peimin Flora Hua's LinkedIn page, from the LinkedIn website, <https://www.linkedin.com/in/flora-hua-23a65287/>, accessed on January 14, 2019, is attached hereto as **Exhibit H**.

10. A true and correct copy of the Fairfax County Department of Tax Administration, Real Estate Division, record for 7505 Blaise Trail, McLean, Virginia, 22102, from the Fairfax County website, which can be searched for at <http://icare.fairfaxcounty.gov/ffxcare/search/commonsearch.aspx?mode=address>, accessed on January 14, 2019, and indicating Mr. Li and Ms. Hua jointly own the property is attached hereto as **Exhibit I**.
11. A true and correct copy of Spring Pharmaceuticals, LLC's ("Spring") website, <http://springpharmallc.com/>, accessed on January 14, 2019, is attached hereto as **Exhibit J**.
12. A true and correct copy of the Commonwealth of Virginia State Corporation Commission entry for Spring reflecting a principal office of 2010 Corporate Ridge, Suite 700, McLean, VA, 22102, from the Commonwealth of Virginia State Corporation Commission's website, <https://sccefile.scc.virginia.gov/Business/S713505>, accessed on January 14, 2019, is attached hereto as **Exhibit K**.
13. A true and correct copy of the June 22, 2018 letter from Mr. Li on behalf of Spring to Defendant Retrophin requesting samples of Thiola is attached hereto as **Exhibit L**.
14. A true and correct excerpted copy of the Regus Group Companies ("Regus") webpage for its listing at 2010 Corporate Ridge, Suite 700, McLean, VA, 22101, <https://www.regus.com/locations/united-states/virginia/mclean/virginia-mclean-corporate-ridge>, accessed on January 14, 2019, is attached hereto as **Exhibit M**.
15. A true and correct copy of the Virginia Uniform Commercial Code ("UCC") Record for Spring, dated August 15, 2018, and downloaded from Commonwealth of Virginia State Corporation Commission's website, which can be searched for at

<https://www.scc.virginia.gov/clk/uccsrch.aspx>, and accessed on January 14, 2018, is attached hereto as Exhibit N.

16. A true and correct copy of the January 19, 2018 fax from Ms. Hua on behalf of Spring to Defendant Retrophin requesting samples of Thiola is attached hereto to as Exhibit O.

I declare under penalty of perjury that the foregoing, including all exhibits and attachments, is true and correct. Executed on January 15, 2019.

Deepti Bansal

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